

NATIONAL LABOR RELATIONS BOARD
REGION 9

PLUMBERS AND STEAMFITTERS,)	
LOCAL 248,)	
)	
&)	Case No. 09-RC-221692
)	
)	
TRI-STATE HEATING AND AIR, LLC)	
)	
)	

MOTION BY TRI-STATE HEATING AND AIR, LLC TO RESCHEDULE HEARING

COMES NOW, Tri-State Heating and Air, LLC, by and through counsel, and pursuant to rules 102.16(b) and 102.24(a) of the Rules and Regulations of the National Labor Relations Board, respectfully moves the National Labor Relations Board for an order rescheduling the hearing in this matter currently set for Tuesday, June 19, 2018.

As the basis for this Motion, Counsel states it was retained on Friday, June 1, 2018 to represent Tri-State Heating and Air, LLC in the current matter. Counsel filed their Statement of Position on June 18, 2018 and raised a number of issues, including but not limited to, the appropriate size of the proposed bargaining unit. Due to the limited time that has been afforded to counsel for Tri-State Heating and Air, LLC, Counsel requests the hearing be rescheduled for a later date.

WHEREFORE, Tri-State Heating and Air, LLC respectfully requests that the June 19, 2018 hearing be rescheduled until June 26, 2018, or at a date deemed appropriate by the National Labor Relations Board.

Respectfully submitted,

/s/ Alexis O. Gonzalez-Lopez
Alexis O. Gonzalez-Lopez
VANANTWERP ATTORNEYS, LLP
1544 Winchester Avenue, 5th Floor
P.O. Box 1111
Ashland, KY 41105-1111
agonzalez@vanattys.com
Office: (606) 329-2929
Fax: (606) 329-0490

CERTIFICATE OF SERVICE

I hereby certify that on June 18, 2018, I electronically filed the foregoing document with the National Labor Relations Board e-Filing system. The foregoing was served via email:

Francis Martorana
O'donoghue and O'donoghue, LLP
5301 Wisconsin Avenue, NW Suite 800
Washington D.C. 20015
fmartorana@odonoghuelaw.com

Paul Williamson
PO Box 1687
Richmond, KY 40476
williamsonpauld@gmail.com